

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of)
)
The Commission's Rules) WT Docket No. 01-309
Governing Hearing Aid-Compatible Telephones)
)
)

Comments of
The Hearing Loss Association of America

The comments submitted here by the Hearing Loss Association of America (HLAA)¹ are in response to a request by Hand Held Products (Hand Held) seeking a determination from the FCC that the hearing aid compatibility obligations in Part 20 do not apply to its mobile computing line of devices.

HLAA believes that these devices should be required to be HAC.

According to Hand Held its products are intended for commercial and

¹ Hearing Loss Association of America is the nation's foremost consumer organization representing people with hearing loss. HLAA's national support network includes an office in the Washington D.C. area, 13 state organizations, and 250 local chapters. The HLAA mission is to open the world of communication to people with hearing loss through information, education, advocacy, and support. HLAA provides cutting edge information to consumers, professionals and family members through a website, www.hearingloss.org, an award -winning publication, *Hearing Loss*, an online newsletter, *ENews*, message boards, and hearing accessible national and regional conventions. HLAA impacts accessibility, public policy, research, public awareness, and service delivery related to hearing loss on a national and global level.

industrial applications, such as warehousing, transportation, inventory, checkout, and package delivery. They give the example of the devices being used by parcel delivery services to record and transmit delivery confirmations. It is for this very reason that we believe the devices should be accessible so that employees who may have hearing loss and use hearing aids and or cochlear implants are able to use them.

In so far as these mobile computing devices are business tools we are not suggesting that they should be accessible for the general consumer market but rather that there should not be any barrier to an employee who uses hearing aids and or cochlear implants needing to access the devices during the course of their work. Employment rates among people with disabilities are below the average and we cannot afford to introduce even more reasons to keep them from working, such as through inaccessible products that could have been made accessible. We see the advent of more and more devices having mobile phone capacity in addition to their basic function. This concerns us as these devices could easily slip through having to comply with regulations required of phones such as the HAC regulations and Section 255.

We also point out that in Federal government environments where such devices are used, under Section 508 of the Rehabilitation Act,

procurement officers should be able to find and procure devices that are accessible to Federal employees in the various Federal agencies that might have a need for mobile computing devices in areas such as warehousing and inventory.

HLAA does not believe Hand Held has justification for a waiver of the FCC HAC rules. On the contrary, we believe there is a compelling employment reason to ensure that its products are HAC and usable by hearing aid and cochlear implant wearers.

Thank you for the opportunity to respond to this public notice.

Yours sincerely,

Terry D. Portis Ed.D
Executive Director
Hearing Loss Association of America
301-657-2248
tportis@hearingloss.org

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